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5 Attorneys for Plaintiffs WOODSTREAM  
CORPORATION; SAFER, INC.;  
6 and DYNAMIC SOLUTIONS WORLDWIDE, LLC.

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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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11 WOODSTREAM CORPORATION;  
12 SAFER, INC.; and DYNAMIC  
SOLUTIONS WORLDWIDE, LLC.

13 Plaintiffs,

14 v.

15 NATANYA NACOLE MATIER,  
16 Defendant.

Case No. 5:24-CV-02728-KK-SP

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR DEFAULT  
JUDGMENT BY THE COURT  
AGAINST DEFENDANT NATANYA  
NACOLE MATIER**

DATE: July 3, 2025

TIME: 9:30 a.m.

CRTM: 3

JUDGE: Honorable Kenly Kiva Kato

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18 Pursuant to Rule 55(b) of the Federal Rules of Civil Procedure,  
19 Plaintiffs Woodstream Corporation ("Woodstream"), Safer, Inc. ("Safer"), and  
20 Dynamic Solutions Worldwide, LLC ("Dynamic") (collectively, the "Plaintiffs"),  
21 by and through its undersigned counsel, will respectfully move this Court,  
22 before the Honorable Kenly Kiya Kato, United States District Judge for the  
23 Central District of California, located at George E. Brown, Jr. United States  
24 Courthouse, 3470 12th Street, 3rd Floor, Courtroom 3, Riverside, CA 92501,  
25 on July 3, 2025 at 9:30 a.m., or as soon thereafter as counsel may be heard,  
26 for the entry of default judgment against Defendant Natanya Nacole Matier  
27 for damages and injunctive relief.

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1 Each of the Plaintiffs seek monetary and statutory damages, as well as  
2 injunctive relief, attorneys' fees, and costs in response to the infringement of  
3 their respective intellectual property rights.

4 Safer, Inc. seeks total statutory damages of \$375,000, representing  
5 \$75,000 for each of the five types of Counterfeit Goods sold by the  
6 Defendant in willful violation of Safer's trademark rights, plus \$11,100 in  
7 attorney's fees as provided by Local Rule 55-3 plus costs per statute.

8 Dynamic seeks patent infringement damages of \$113,230 in lost  
9 profits based on a net profit of 30% on sales of Counterfeit Goods totaling  
10 \$377,434.00. See McQuillan Decl. at ¶¶ 8-11. Dynamic also seeks  
11 judgment for attorneys' fees in the amount of \$5,864.60 as provided by  
12 Local Rule 55-3.

13 Lastly, Woodstream seeks statutory damages of \$30,000 for  
14 Defendant's willful copyright infringement of the Safer Home Glue Card  
15 Design, plus attorneys' fees in the amount of \$2,399.99 as provided by Local  
16 Rule 55-3.

17 This application is based on the Notice, Memorandum of Points and  
18 Authorities in support thereof, the Declaration of Michael R. Gibson, the  
19 Declaration of Paul McQuillan, all pleadings on file in this action, and such  
20 further evidence and argument as may be presented at the hearing on this  
21 matter.

22 The parties have not met and conferred about the relief sought herein.  
23 Defendant Matier has not appeared and Plaintiffs are unaware whether  
24 Matier is represented by counsel. Accordingly, Plaintiffs were unable to  
25 confer with counsel for Matier pursuant to Local Rule 7-3 prior to submitting  
26 its application.

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1 Dated: May 13, 2025

HIGGS FLETCHER & MACK LLP

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By: /s/ Michael R. Gibson  
MICHAEL R. GIBSON  
Attorneys for Plaintiffs WOODSTREAM  
CORPORATION; SAFER, INC.;  
and DYNAMIC SOLUTIONS  
WORLDWIDE, LLC.